

Commenter: Ron Erdmann

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Subject: Respectfully, here are my comments related to the OMB Control Number 0625-0227 request for comments:

(a) Evaluate whether the proposed information collection is necessary for the proper functions of the Department, including whether the information will have practical utility;

If you review the U.S. Department of Commerce mandates from congress you will see there are several acts that justify why this collection is necessary for the proper function of the Department of Commerce through the NTTO. These acts include: **The Travel Promotion Act of 2009**, Section 10 of Public Law 104-288, and **the National Tourism Organization Act of 1996**. Furthermore, Commerce was also required by congress to collect and distribute international travel statistics also through the **National Tourism Policy Act of 1981** (Public Law 97-63), and **International Travel Act of 1961** (Public Law 87-63). In addition, the NTTO survey of international air travelers (SIAT) data is one of the main sources used by another Commerce Agency, the Bureau of Economic Analysis (BEA) in their calculations of the travel and passenger fares data for exports and imports. BEA is mandated by the following acts to perform this work and since the NTTO supplies this data to BEA, it allows this agency to comply with these acts. **Section 8 of the Bretton Woods Agreements Act of 1945** (Public Law 79-171, as amended), and implemented by **Executive Order No. 10033**. Furthermore, the BEA also uses the SIAT data to develop the international estimates for the Travel & Tourism Satellite Accounts and the NTTO and BEA have worked together for decades to produce this data.

The NTTO and the Commerce, Commercial Service, Travel & Tourism Team use the NTTO SIAT data to provide consultation services to their clients to expand travel and tourism exports a mandate of the International Trade Administration (ITA). Both offices use the data for presentation and reports they issue to guide the government and private sector with key market intelligence for policy decisions and market planning that they implement related to international travel to and from the country. The [country profiles](#) issued by the NTTO support for the foreign posts in each of these markets in their efforts to expand travel and tourism promotion/exports. The [state and city visitation](#) estimates for all overseas and by country help the U.S. domestic offices of the Commercial Service Travel & Tourism Team illustrate of the importance of international travel to these destinations.

The NTTO uses the SIAT data in working with the federal agencies involved in the Tourism Policy Council and the private sector firms who participate in the Commerce, Travel & Tourism Advisory Board.

If you review the [U.S. Department of Commerce's 2022–2026 Strategic Plan](#), in which the NTTO is an office within ITA, there are several elements of the plan that the NTTO's SIAT allows the Department to achieve goals under:

- **Drive U.S. Innovation and Global Competitiveness**
- **Expand Opportunity and Discovery Through Data**
- **Provide 21st Century Service with 21st Century Capabilities**

Plus, over the years there have been many other federal government agencies who also use the NTTO

data for their own understanding of the international market and they include: The Department of Homeland Security, National Park Service, Bureau of Indian Affairs, the Department of Transportation, The Center for Disease Control and Federal Aviation Administration. The SIAT data supplements information each of these agencies need and provides critical market intelligence they cannot obtain from their own programs.

Numerous travel and tourism associations link to the NTTO site and use their data to provide key market intelligence to their members they cannot obtain elsewhere. Included are: The Travel & Tourism Research Association, U.S. Travel Association, National Tour Association, Airport Council-International-North America, Airlines 4 America, International Inbound Travel Association, American Indian, Alaska Native Travel Association, and others. In addition to linking to the NTTO these association have had NTTO staff speak about the international market using the SIAT data at their conferences, used it to support their own international initiatives, developed their own publications and reports using the NTTO data and more.

Within the travel industry, there are also tourism regions (states & businesses who work together to promote international travel to the U.S.) like Discover New England, Capital Region, USA, Travel South, Go West, and the Great Lakes who have bought data from the NTTO in past years and had them speak at some of their conferences,

Of course, many of the top state's tourism offices and city convention & tourism bureaus also rely upon the NTTO as the only source of comparable estimates of international travel to their destinations. Several had had the NTTO speak at their conferences and many buy data from the NTTO to not only just provide the overseas, regional and country visitation estimates for their destination, but more importantly, they rely upon the key market characteristics about international visitors to their destinations to guide their decision in the marketplace. They use the data developing their marketing and promotion strategies, their partners, to educate their members or businesses within their state and more.

Additionally, there are other private sector users of the NTTO data including travel and tourism consulting firms, hotel chains, rental car agencies, trade show organizers, attractions, and others who rely upon the NTTO SIAT data for key market intelligence they cannot obtain elsewhere. Even foreign national tourism offices or companies like Rail Europe as well as trade publications use the NTTO data. Universities also use the NTTO SIAT data to inform their students of the resources available from the U.S. government that are available to them once they enter the industry.

So, as you can see the NTTO has its own uses, as do other U.S. federal agencies, travel associations, regional, state and city travel organizations, and the private sector all rely upon the NTTO SIAT data. So, the SIAT does provide information necessary for the proper functions of the Department, and as I have described they also provide practical utility to countless travel-related organizations.

(b) Evaluate the accuracy of our estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used;

The NTTO SIAT program was started late in 1982 by the U.S. Department of Transportation and US Department of Commerce. Since releasing annual data in 1983, they have continued to provide key market intelligence for the US government, travel industry and others now for 41 years. The contract for this program has been competitively bid out over the years with full and open competition to the private sector to win this contract. Open competition means competitive prices are obtained for the winning bids

over the decades. The NTTO has also tried numerous public/private partnerships to keep prices down over the decades. The NTTO sells data from this program to help offset the government investment into the program and the money from sales after paying the contractor is invested back into the program. The costs have been tracked over decades of implementing it and there is a 1% sample of the international travel population mandate required by congress in the *Travel Promotion Act of 2009*. But please note, the NTTO has never been able to get close to surveying near the 1% level required because congressional funds have never been provided. Since OMB also is involved in budget authority maybe OMB should provide Commerce, ITA, NTTO with the resources to fulfill this mandate.

Over the decades, the NTTO pretested the survey each time it revised the survey instrument (1983, 1985, 1996, & 2012 based upon industry input) and that is how the time burden estimates were developed. On a related note, for the survey to be valuable and provide utility to the government and travel industry, providing funds to the NTTO to revise the survey instrument to respond to the ever-changing travel industry would be a welcome improvement. Forcing them to take money from the existing program means reduced surveys for the industry to use, and when Commerce is charged with helping smaller businesses, smaller samples mean these smaller businesses will not have enough surveys to provided quality estimates, so again additional resources will be needed for this effort as well.

Over the decades, the NTTO has looked at and revised the methodology for the program. It has tested new possible methodologies and is going to launch a new visitation estimate validity program shortly. Over the decades the NTTO has made its mission to improve this program and make the most of the resources it has been provided, many times with budget cuts coming from the International Trade Administration (ITA). Since they also rely upon U.S. airports and a few airlines for access to international passengers, it is also challenging to conduct the program when pandemics or acts of terrorism reduce travel and cause additional security or safety measures to be implemented all driving up the cost and complexity of the program. The NTTO has also invested in numerous tests, usually having to sacrifice sample size to perform them. With limited resources from the ITA, conducting tests to improve the program can be a major challenge. The travel industry wants more surveys, and each year the program costs increase, but the budget does not always increase. If the OMB really wanted improvements, it would make available a grant program or provide supportive funding to federal agencies to test new methodologies or technologies. None of this is free; to test new methods you need money for the test. Over the decades the NTTO has made the most of the limited resources available.

(c) Evaluate ways to enhance the quality, utility, and clarity of the information to be collected;

The NTTO should be commended for the tests they have performed to improve the quality of this program. Over the years when the questionnaire has been changed, they have always gone out their users to refine the survey instrument. They have used the airlines to help translate the surveys and they have worked with airlines and airports to test new possible methodologies. They obtain guidance from the Commerce, Travel & Tourism Advisory Board which has looked at this program and offered their own private sector recommendations. The NTTO also uses the Tourism Policy Council (TPC) to work with other federal agencies involved in travel and tourism and the NTTO data has been modified over the years to support TPC initiatives. If you look at the subscribers to this data, some who have been buying data for over 30 years from the NTTO it shows the value and utility of this program. Every time the questionnaire has been changed, they have pre-tested the English and foreign language versions before implementing the new survey instrument. The NTTO has also worked with the Commerce Bureau of Census in the redesign of the survey as well as conducting meetings with Census Bureau staff on how to improve the program. The strive for more and more sample for the program is ongoing and as new users

find this program the need for additional sample becomes greater. Larger destinations now want larger samples so they can expand into new export markets. Smaller destinations and businesses need a larger sample so they can justify their investment into the international marketplace. Again, with the congressional mandate for a 1% sample, if funded, would go a long way to providing quality data to the government and travel industry.

To enhance the quality, utility, and clarity of the information to be collected the NTTO has invested heavily into expanding their travel monitors. The NTTO has the SIAT [Inbound](#) & [Outbound](#) Travel Monitors, and they now post the quarterly and annual [SIAT inbound](#) and [SIAT outbound](#) reports. They also have the [state and city visited monitor](#). Recently, they also just added the [new country monitor](#).

Although, I think taking down and not updating the 1997-2021 sector, activity, world regions and country market profiles is a huge loss of historical trends that could be used to analyze shifts in traveler patterns to help figure out the future. I would hope the NTTO would bring them back and keep them updated as another way to display the data in addition to the monitors.

(d) Minimize the reporting burden on those who are to respond, including the use of automated collection techniques or other forms of information technology. (2024)

The NTTO has conducted several tests in this area in the past, and reference them in their methodology section of the SIAT. Each test has confirmed that the current methodology is the most effective mechanism for data collection for this program. The competitive bidding process has also meant that the winning bid provides the best technology and methodology for this program. Constant pressure for funding and limited resources from ITA keep the NTTO staff constantly working to save money so more can be put back into the program to provide more data for the federal government and industry. Again, if OMB wants agencies to make these improvements, just to test them costs money the office does not have. So, you find yourself in a catch 22. If OMB were to provide resources, there would be more agencies using these resources to make improvements. Programs are stretched to the maximum to provide the most for the money they are provided. By providing seed money, agencies and offices could do more tests which just save money down the line and improve the quality of the federal programs. I had worked for and with the NTTO for over 30 years and know full well the dedication and outstanding efforts of the staff and contractors involved in this program. To me, it is a model of effectiveness, ingenuity, resourcefulness that OMB should be rewarding with continued support for this highly effective, utilitarian, innovative, public/private partnership that provides key marketing intelligence you cannot find anywhere else in the world.

My hope is that the OMB continues to approve this program so it can continue to guide this industry that has been hurt by the pandemic far more than any other extra sector (goods & services) of the USA economy. If you look at the Commerce 2023 preliminary BEA/NTTO estimates for exports and imports you will see the travel was the largest service export and import in 2019 at \$239 billion, down 1% from the peak in 2018. Total international arrivals also peaked in 2018 at 79.7 million and declined slightly to 79.4 million in 2019. Then, the pandemic had a much larger impact on travel and tourism as it did on other exports. In 2020, total travel & tourism exports (combined travel & passenger fares) fell to \$84.3 billion, down 65% from 2019. The largest single year decline in the history of travel exports. Total travel and tourism exports fell to fourth place for top services exports in 2020. Total services' exports totaled \$726.3 billion, down 19% from 2019. No other top line service exports dropped by more than 37% compared to the previous year, so total travel & tourism exports declined by 1.75 times more than any other top services exports. No good export category saw this level of decline either. By 2023, total international arrivals were 66.5 million, up 31% over 2022, but still down 16% from total international

arrivals in 2019. Total travel & tourism exports rebounded to \$225.9 billion, up 31% over 2022, but still down 6% when compared to 2019. Total services exports rebounded to \$1.026 trillion in 2023, up 8% over 2022, and up 23% when compared to 2019. All the other top 10 services exports have increased between 2019 and 2023 except construction. Total travel & tourism exports have moved up to the second largest service export behind other business services in 2023. Good exports declined by 2% in 2023 over 2022 but compared to 2019 total good exports are up 123%. So total travel & tourism arrivals and exports still lag. Maybe more resources are needed to bring travel and tourism back to the top services export for the country. Providing more market research, including the NTTO SIAT program could help travel businesses obtain the market intelligence they need to be competitive in the global international travel and tourism export marketplace.

When you compare the USA travel exports (excluding passenger fares) to the travel exports reported by other countries from the United Nations World Travel & Tourism Office (UNWTO), the U.S. maintained its number one ranking it held in 2019 through 2023. But the US' travel exports fell from \$199 billion to \$175.9 billion in 2023, still only 88% of the 2019 figure. Among the top 10 world travel export markets in 2019, only Thailand at 50% of its 2019 export level and Japan at 84% of its 2019 travel export totals have declined at a slower rate than the USA. Spain, France, the U.K. and Italy have all exceeded their 2019 travel exports levels in 2023.

If any industry needs support via the marketing intelligence provided by the SIAT, it will be the travel and tourism industry. Without key market intelligence provided by this program, the industry will not be able to gauge how travel to and from the USA has changed during and post pandemic. If ever more resources were needed now is the time to provide the resources required to keep this program going at a critical time in this country's history. Travel has been a key export and import for the country and has driven the services sector. Without it, other exports and imports will suffer as travel leads to the deals that generate the other exports and imports for this country. Now more than ever, this program needs the support and investment by the U.S. government.

I strongly support the continuation of the SIAT and the related programs administered and funded by the NTTO through ITA and I hope OMB works with Commerce and congress to expand it.

I saw in the FRN, you were interested in learning more about me and asked several questions. My response is below:

- 1. tell us about yourself! I am.an Individual**
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